

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	Civil Action No. 7:23-cv-01427-TMC
)	
Plaintiff,)	
)	
v.)	
)	REQUEST OF DEFENDANT/
Litchain Corp. and Gaffney Board of Public)	COUNTERCLAIMANT/ CROSS-
Works,)	CLAIMANT, GAFFNEY BOARD
)	OF PUBLIC WORKS, FOR
Defendants.)	PROTECTION
)	
Gaffney Board of Public Works,)	
)	
Defendant/Counter and)	
Cross Claimant,)	
v.)	
Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	
)	
Counterclaim Defendant,)	
and)	
)	
Litchain Corp.,)	
)	
Crossclaim Defendant.)	
)	

Comes now Defendant/Counterclaimant/Crossclaimant, Gaffney Board of Public Works, South Carolina (“Gaffney BPW”), by and through undersigned counsel of record, and pursuant to Local Civil Rule 6.02 and the instructions set forth in the Conference and Scheduling Order filed on June 6, 2023 (ECF No. 31), notifies the Court of the dates during the month of February 2024 that it is not available for trial.

Gaffney BPW holds an annual long-term planning conference each February. In 2024, the conference will take place on February 13 and/or 20. Gaffney BPW requests protection from trial

and other court appearances on these dates, as its trial representative and the fact witnesses employed by it that are expected to testify at trial must attend this conference.

Due to the presently known conflicts set forth above, Gaffney BPW requests protection from trial and other court appearances on February 13 and 20, 2024. This written notice is being provided within seven days of the scheduling order notifying the parties of the trial setting, and Counsel for Plaintiff and Counterclaim Defendant Blockquarry Corp. f/k/a ISW Holdings, Inc. consents to this request. This Court should, therefore, grant Gaffney BPW's Request for Protection.

Respectfully submitted,

POPE FLYNN, LLC

June 13, 2023

By: /s/ Virginia P. Bozeman

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